

Exhibit 38

October 23, 2020

14 to 17

<p style="text-align: right;">Page 14</p> <p>1 - BERNITA JAMISON -</p> <p>2 when you've had a chance to review it.</p> <p>3 A. Okay.</p> <p>4 Q. Although perhaps in a different</p> <p>5 format, does this reflect the information that you</p> <p>6 shared with us thus far today during your</p> <p>7 testimony?</p> <p>8 A. In part.</p> <p>9 Q. Okay. Does this reflect your</p> <p>10 public-facing LinkedIn page?</p> <p>11 A. I believe so.</p> <p>12 Q. Okay, thank you. You can put</p> <p>13 that -- or close that on that exhibit.</p> <p>14 And so I would like to ask you a few</p> <p>15 questions about your function at ER.</p> <p>16 Let's start with the general function</p> <p>17 of ER at Google. So what is the employee</p> <p>18 relations function at Google?</p> <p>19 A. The employee relations team -- team</p> <p>20 looks into concerns related to potential</p> <p>21 harassment, discrimination, retaliation, in some</p> <p>22 jurisdictions bullying.</p> <p>23 We also provide advice to HR business</p> <p>24 partners and also we vet and review business cases</p> <p>25 associated with company restructure and</p>	<p style="text-align: right;">Page 16</p> <p>1 - BERNITA JAMISON -</p> <p>2 Q. Any others?</p> <p>3 A. And other investigation teams,</p> <p>4 depending on the nature of the concern.</p> <p>5 Q. What would those other investigations</p> <p>6 teams be?</p> <p>7 A. We have, I believe, five in total.</p> <p>8 So employee relations is one. Should I go back to</p> <p>9 our --</p> <p>10 MR. GAGE: Why -- why don't we maybe</p> <p>11 -- Hope, just if you could reread the</p> <p>12 question and then the witness can just start</p> <p>13 over again.</p> <p>14 (The question requested was read back</p> <p>15 by the reporter.)</p> <p>16 A. Correct. Employee relations is one.</p> <p>17 XWS is the other, internal audit, ethics and</p> <p>18 compliance, and global investigations which is our</p> <p>19 security function. I believe that's five.</p> <p>20 Q. Thank you. What is the role of HRBP?</p> <p>21 So how do you all partner with HRBP when you're</p> <p>22 investigating a complaint?</p> <p>23 A. So to be clear, there are two</p> <p>24 different types of HRBPs at Google; people</p> <p>25 partners and people consultants. We partner most</p>
<p style="text-align: right;">Page 15</p> <p>1 - BERNITA JAMISON -</p> <p>2 reorganization.</p> <p>3 Q. Okay. You mentioned Google's</p> <p>4 business entity. What is ER's relationship with</p> <p>5 the business entity?</p> <p>6 A. Can you clarify that question for me?</p> <p>7 I'm not sure.</p> <p>8 Q. Sure. So how do ER and the larger</p> <p>9 business entity of Google interact in -- in</p> <p>10 furtherance of ER's sort of goals of vetting and</p> <p>11 advising on ER matters?</p> <p>12 A. So when an employee raises a</p> <p>13 concern that appears to be potential harassment,</p> <p>14 retaliation, discrimination, or bullying it's our</p> <p>15 responsibility to investigate and look into the</p> <p>16 matter and understand if any Google policies have</p> <p>17 been violated and, if so, to make recomm --</p> <p>18 recommendations for sanctions.</p> <p>19 Q. Okay, and -- and what is the</p> <p>20 relationship between ER and HRBP, if any?</p> <p>21 A. We are partners in some instances and</p> <p>22 advisors in others.</p> <p>23 Q. Okay. Are there any other Google</p> <p>24 entities with which ER routinely interacts?</p> <p>25 A. Employment legal.</p>	<p style="text-align: right;">Page 17</p> <p>1 - BERNITA JAMISON -</p> <p>2 closely -- or actually we partner closely with</p> <p>3 both, but the people consultants oftentimes is the</p> <p>4 first person that a concern is raised to via</p> <p>5 a -- a link that we have called Go My HR that</p> <p>6 employees would use to raise concerns.</p> <p>7 So because they're the first</p> <p>8 individual to hear about the concern, we often</p> <p>9 need to partner with them to understand if it is</p> <p>10 something that needs to be investigated or handed</p> <p>11 off.</p> <p>12 Q. And how about people consultants,</p> <p>13 what's their role?</p> <p>14 A. That is the people consultant.</p> <p>15 Q. Okay, partner?</p> <p>16 A. So the people partner supports</p> <p>17 specific -- specific business leaders or general</p> <p>18 HR matters.</p> <p>19 In some instances an employee would</p> <p>20 note who this person is and they may also be an</p> <p>21 individual who someone shares their concern with</p> <p>22 initially.</p> <p>23 Q. Okay. Is it correct that people</p> <p>24 partners are essentially partnered with certain</p> <p>25 employees at Google and they maintain that</p>